

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

STATE OF TEXAS, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States

Defendant,

and

FRIENDS OF THE EARTH, et al.,

Intervenor-Defendants.

Case No. 9:25-cv-00010-MJT

DECLARATION OF JOANIE STEINHAUS

I, Joanie Steinhaus declare as follows:

1. My name is Joanie Steinhaus, and I am over 18 years old. The information in this declaration is based on my personal experience and my review of publicly available information.
2. My primary residence for the past 12 years is in Galveston, TX.
3. I am the Ocean Director for Turtle Island Restoration Network (TIRN), which is a non-profit organization founded in 1989 and is dedicated to protecting and conserving marine wildlife. TIRN's principal place of business is in Olema, CA with a satellite office in Galveston, TX. TIRN's mission is to mobilize people in local communities around the world to protect marine wildlife and the oceans and inland watersheds that sustain them. With our members, volunteers, interns, and staff, TIRN engages in multiple activities to protect, advocate, educate, and enhance the scientific knowledge of marine species, including threatened and endangered species. As a staff member, I rely on TIRN to represent my interests in conserving and protecting

species in their native habitat and fully support my organization's mission of protecting the ocean and marine wildlife from extinction.

4. I have worked for TIRN since May 2013 as the Gulf Program Director and July of 2023, I was promoted to Ocean Director. I have coordinated volunteer sea turtle nest patrols on the upper Texas coast from 2013–2020, and I have responded to sea turtle tracks or nesting sea turtles to excavate the eggs to be moved to a protected incubation site. I manage all programs and projects for our conservation work throughout the Gulf, and this includes building ecological understanding and coordination of conservation actions through public education, involvement, and outreach. My work has a strong connection to marine wildlife found in the Gulf including reduction of bycatch in fisheries with both commercial and recreational anglers, vessel strikes, and recovery of lost fishing gear. In addition, we work to raise awareness of marine life, migratory swimways, breeding behaviors, and critical habitat. Through my work with TIRN, my background, training, and education, I began and continue to be involved in marine and terrestrial species protection and habitat conservation.

5. TIRN has over 26,143 supporters located in the Gulf of Mexico, 7,431 in the San Francisco Bay area and 100,957 members and supporters across the United States and the entire world. TIRN's members rely on the Gulf of Mexico for activities ranging from fishing, photography, boating, birding, and other wildlife observation, and scientific study—all of which depend on healthy and abundant populations of our region's marine wildlife. These interests are threatened by continued and expanding oil and gas development in the Gulf. The industrial activities associated with offshore drilling not only cause chronic pollution and occasional catastrophic oil spills, but these activities put wildlife more directly at risk through impacts with vessels and noise. TIRN's members depend on the organization to advocate for their interests

and concerns regarding the protection, conservation, and preservation of the Gulf's marine ecosystems, and the protection of endangered, threatened, and vulnerable marine species.

6. We pursue multiple strategies to represent our member's interests and concerns regarding the protection, conservation, and preservation of the Gulf's marine ecosystems, and in particular the protection of endangered and threatened sea turtles and the endangered Rice's whale. On behalf of our members and supporters, we engage in litigation, advocacy, and public education efforts to highlight both the wonders of Gulf wildlife and the threats they face. We also alert and encourage our members to weigh in on decisions and actions that affect these interests. For example, we have commented extensively opposing the expansion of oil and gas activities in the Gulf and related activities, including written and oral comments and other public advocacy urging no new leases in the Bureau of Ocean Energy Management's most recent five-year lease program, in opposition to oil export terminals like the Gulf Link and SPOT in the Gulf as well as in support of habitat protections for endangered Rice's whales throughout their range in the Gulf. We have also participated in opposition to projects that would affect other waters and coasts, such as the restart of the Santa Ynez Unit, an offshore oil and gas platform located off the coast of California, and fossil fuel pipelines like Commonwealth.

7. Given what we have learned and experienced working against offshore drilling in the Gulf of Mexico, TIRN also recently joined close to 200 other organizations across the country urging President Biden to use his legal authority to permanently protect more areas from offshore drilling. TIRN also sent an action alert email to our members to oppose the Trump administration's revocations of President Biden's protections, and to encourage them to speak up to preserve this historic step toward protection of our natural resources and combating the climate crisis. And of course, when necessary, we engage in litigation, including recent cases

against the Department of Interior's five-year offshore leasing program, *Healthy Gulf v. U.S. Dep't of Interior*, No. 24-1024 (D.C. Cir. filed Feb. 12, 2024), and *Sierra Club v. National Marine Fisheries Service*, No. 20-03060 (D. Md. filed Oct. 21, 2020), challenging the failure to adequately protect Gulf species from the harms caused by ongoing and future offshore oil and gas exploration and development. While this litigation, and my own day-to-day work necessarily focuses on the Gulf of Mexico, TIRN's broader goals include stopping the expansion of offshore oil and gas activities throughout the lower 48-states.

8. I live in Galveston within nine blocks of the Gulf of Mexico and enjoy the view of the ocean and wildlife in many of my recreational pursuits. I frequently ride my bike along the city's seawall, walk the seawall, and swim in the Gulf in various areas along the 30 plus miles of beachfront access to the Gulf. I also am an avid stand-up paddle boarder, and with my husband, we own a small motorized boat. I spend most weekends from March through November on the water in the Gulf or bays in either a non-motorized or motorized watercraft. I frequently see dolphin and fish, and at times I have seen sharks, manta rays, and threatened and endangered sea turtles while on the water. I am a certified scuba diver, and I have enjoyed hundreds of dives, including in the Gulf of Mexico, to see marine wildlife. Being on the water builds a connection to the marine environment and offers the opportunity to disconnect from the electronic world that surrounds us. I have always appreciated the ocean and marine wildlife, and I am intensely dedicated to its preservation.

9. I also know the continued day-to-day pollution from rigs and vessels, the chemicals, and drilling mud used in oil exploration harms all marine life and reduces the abundance of species needed to ensure a healthy ecosystem. An ecosystem I work daily to protect. Marine mammals, sea turtles, sharks, and fish face numerous threats from activities

including oil and gas exploration, dredging, construction of oil and gas export terminals, and movement of large vessels. The operation of these activities significantly degrades air, water, and sound quality in the Gulf, impairing wildlife habitat and reducing prey abundance. The activities also directly impact wildlife, including endangered sea turtles and the Rice's whale, through vessel strikes and entanglement in marine debris. The exploration for oil creates noise that harms wildlife and drives them away from these areas where I enjoy my personal recreational activities, not allowing me the opportunity to view wildlife in their natural habitat or the ocean view.

10. Ultimately, wildlife in the Gulf is significantly harmed, injured, or killed every day by the ongoing operations of oil and gas activities. I am genuinely concerned about the survival and recovery of shark, fish, marine mammals including the 51 remaining Rice's whales, sea turtles, and sea birds in the Gulf of Mexico. The continued existence of these remarkable marine animals in the wild enhances my quality of life, experiences, and allows me to pursue my professional goal of promoting recovery of species in the Gulf of Mexico. I gain significant professional, recreational, and aesthetic benefits from these animals and the healthy marine environment they require for their existence.

11. Expanded exploration, drilling, rigs, production, and vessel activity anywhere in the Gulf would also increase the likelihood of injury to multiple marine species, including the five species of sea turtles found in this area, which I care about and work directly to protect. All five species of sea turtles found in the Gulf of Mexico are threatened or endangered. They are also distant travelers, both regionally within the Gulf and along the Atlantic coast from Florida to New England. All five species of sea turtles migrate throughout the Gulf of Mexico, and at least three species are heavily dependent on areas within the Eastern Gulf: the loggerhead and green sea turtle nest primarily on Florida beaches, and the leatherback forages along the west Florida

continental shelf and in the waters of the Central Gulf of Mexico during the autumn and winter. As such, they rely heavily on both clean nesting beaches and clean ocean habitat throughout the Gulf of Mexico and the U.S. Atlantic coast. I have no doubt that expanded oil drilling activities anywhere in their range will dramatically increase the harm sea turtles and decrease the number of turtles nesting on our beaches, based on the impacts to all sea turtle populations in the Gulf from the Deepwater Horizon spill. An estimated 4,900–7,600 large juvenile and adult sea turtles and between 56,000–166,000 small juvenile sea turtles were killed by the spill. Furthermore, an estimated 35,000 hatchlings were lost due to the effects of the spill and associated clean-up activities on sea turtle nesting beaches. The spill had similarly devastating effects on Rice’s whales, killing more than one-fifth of the already low population. Preventing the expansion of new/additional oil platforms and thereby reducing this industrial activity in these species’ habitats is a first step—but by no means the only step—that federal agencies need to take to ensure their continued survival as required by law.

12. The Presidential memorandum that plaintiffs challenge in this case permanently withdraws areas in the Pacific Ocean, the Atlantic Ocean, and the Eastern Gulf of Mexico, from future leasing (and hence, subsequent exploration and development of those leases) for oil or natural gas. The withdrawals were justified, in part, on the explicit need to protect “the marine and coastal environments, including wildlife and wildlife habitat” as well as vulnerable “ecosystems and coastal communities” from harms from oil spills and other threats.

13. The permanent withdrawal of these areas from oil and gas development directly furthers and protects TIRN’s core interests in marine wildlife and environmental protection. As described above, oil and gas exploration or development activities, including seismic surveying, destroy, degrade, or diminish the wild and natural state of these areas and through industrial

activities like vessel traffic, oil spills, and other pollution, they kill, injure, harm, harass, or displace wildlife. All of these effects interfere with TIRN members' use and enjoyment of the areas and associated wildlife. If the plaintiffs are successful in their challenge to President Biden's withdrawals, it would remove protections that otherwise permanently prevent these harmful activities, and hence enable the harms from oil and gas exploration and development activities to TIRN and its members. For me personally, if the plaintiffs succeed and remove permanent protections from the Eastern Gulf, the Atlantic Ocean, and other areas to maximize oil and gas development, the species and habitat I deeply care about and work every day to protect will experience even greater harm from oil and gas activities.

14. Federal defendants in this litigation do not adequately represent TIRN's interests. As detailed above, the federal agencies with responsibility for regulating offshore oil and gas activities have repeatedly elevated maximized leasing over protection of wildlife and the environment. TIRN and these agencies have long been adverse parties in multiple lawsuits regarding Gulf oil and gas leasing. This long-standing divergence of interests is widened further by President Trump's explicit policy to maximize offshore oil and gas leasing as expressed in several other Executive Orders as well as more recent Orders from the Secretary of Interior requiring agencies to "take all actions available to expedite oil and gas leasing" in offshore waters. Given this history and these more recent actions to execute policies that directly conflict with and undermine the protections that benefit TIRN and that TIRN has fought to achieve, the federal defendants simply cannot adequately represent TIRN's focused wildlife and environmental protection goals in this litigation.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on the 13th of April, 2025, in Galveston, Texas.

Joanie Steinhaus